# UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al.,

Defendants.

NORTH CAROLINA STATE CONFERENCE OF

Plaintiffs,

v.

THE NAACP, et al.,

PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al.,

Defendants.

Civil Action No. 23 CV 1057

Civil Action No. 23 CV 1104

### **WILLIAMS PLAINTIFFS' PRETRIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's May 23, 2024 Notice of Hearing, ECF No. 50, *Williams* Plaintiffs respectfully submit the following Pretrial Disclosures. *Williams* Plaintiffs reserve the right to amend and supplement these Pretrial Disclosures, and to respond to Defendants' Pretrial Disclosures, as appropriate. Williams Plaintiffs also reserve the right to supplement or modify these disclosures based on the Court's rulings on any outstanding issues, including motions in limine.

#### I. WITNESSES

Williams Plaintiffs' Witness List is attached as Exhibit A. Because Williams Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at trial, they reserve the right to modify, amend, or supplement this witness list leading up to and through trial based on case developments, including without limitation the right to: (1) call their witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on another party's witness list and any witness necessary to rebut Defendants' case, arguments, and/or evidence, and/or to authenticate or lay the foundation for the introduction of documents to which Defendants object; (4) reasonably supplement or amend this witness list through and including the time of trial to the extent agreed upon by the parties or permitted by the Court; (5) introduce deposition testimony as impeachment evidence; (6) change a witness from a live witness to a witness testifying by deposition, and vice versa; or (7) change a witness from a live witness to a witness testifying by declaration. Williams Plaintiffs reserve the right to supplement or modify this witness list in response to rulings made by the Court. Williams Plaintiffs' identification of any witness listed herein is not an admission that the testimony would be admissible if offered by Defendants.<sup>1</sup>

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<sup>&</sup>lt;sup>1</sup> Pursuant to the Court's May 15, 2025 Order, the deadline to exchange deposition designations under Federal Rule of Civil Procedure 26(a)(3) for witnesses who become unavailable for trial has been modified to June 25, 2025, and the deadline for objections and counter-designations for deposition designations has been modified to June 30, 2025. ECF No. 115.

### II. TRIAL EXHIBITS

Williams Plaintiffs' Trial Exhibit List is attached as **Exhibit B**. Williams Plaintiffs reserve the right to offer any exhibit identified by any other party in their Pretrial Disclosures and to introduce additional documents as rebuttal or impeachment evidence. Williams Plaintiffs also reserve the right to modify, amend, or supplement this exhibit list leading up to and through trial. Williams Plaintiffs' identification of any exhibits listed herein is not an admission that the exhibit would be admissible if offered by Defendants. Williams Plaintiffs may offer portions of listed exhibits at trial. Williams Plaintiffs' list of trial exhibits does not include demonstrative exhibits, which the parties have agreed to exchange shortly before a corresponding witness testifies.

Dated: May 16, 2025

### /s/ Narendra K. Ghosh

#### PATTERSON HARKAVY LLP

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<sup>\*</sup> Special Appearance pursuant to Local Rule 83.1(d)

# Exhibit A

## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al.,

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v.

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Defendants.

NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al.,

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v.

PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al.,

Defendants.

Civil Action No. 23 CV 1057

Civil Action No. 23 CV 1104

## **WILLIAMS PLAINTIFFS' WITNESS LIST**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's May 23, 2024 Notice of Hearing, ECF No. 50, *Williams* Plaintiffs respectfully submit the following list of witnesses they expect to testify at trial.

Will-Call Witnesses	
1	Earl Jones – Plaintiff

2	Pamlyn Stubbs – Plaintiff
3	Chenita Johnson – Plaintiff
4	Allison Shari Allen – Plaintiff
5	Jonathan Rodden – Expert Witness
6	Max Palmer – Expert Witness
7	Chris Clark – Expert Witness
8	James L. Leloudis II – Expert Witness
9	Senator Ralph Hise – Adverse Witness
10	Blake Springhetti – Adverse Witness
May-Call Wit	nesses
11	Shauna Williams – Plaintiff
12	Minerva Freeman – Plaintiff
13	Armenta Eaton – Plaintiff
14	James Adams – Plaintiff
15	Laura McClettie – Plaintiff
16	Virginia Keogh – Plaintiff

# Exhibit B

## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al.,

Plaintiffs,

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REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al.,

Defendants.

NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

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PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al.,

Defendants.

Civil Action No. 23 CV 1057

Civil Action No. 23 CV 1104

## **WILLIAMS PLAINTIFFS' EXHIBIT LIST**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's notice, ECF No. 50, *Williams* Plaintiffs respectfully submit the following list of exhibits they may offer as substantive evidence at trial.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> In accordance with the Court's May 15, 2025 Order, ECF No. 115, *Williams* Plaintiffs will confer with all parties to submit a Joint Exhibit List and intend to file an Amended Exhibit List removing exhibits that will instead be listed on the Joint Exhibit List.

Exhibit Number	Exhibit Description	Document Identification
	Expert Reports <sup>2</sup>	
WX1	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024)	
WX2	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024)	
WX3	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025)	
WX4	Expert Report of Maxwell Palmer, Ph.D. (Aug. 1, 2024)	
WX5	Reply Report of Maxwell Palmer, Ph.D. (Oct. 17, 2024)	
WX6	Supplemental Expert Report of Maxwell Palmer, Ph.D. (March 17, 2025)	
WX7	Supplemental Rebuttal Report of Maxwell Palmer, Ph.D. (March 31, 2025)	
WX8	Expert Report of Dr. Chris Clark (Corrected) (Aug. 1, 2024)	
WX9	CV of Dr. Chris Clark	
WX10	Expert Reply Report of Dr. Chris Clark (Oct. 17, 2024)	
WX11	Supplemental Expert Report of Dr. Chris Clark (March 17, 2025)	
WX12	Supplemental Rebuttal Expert Report of Dr. Chris Clark (March 31, 2025)	
WX13	Expert Report of Dr. James L. Leloudis II (Aug. 1, 2024)	
WX14	Expert Report of Dr. Joseph Bagley, Ph.D (Corrected) (Aug. 1, 2024)	
WX15	Expert Reply Report of Dr. Joseph Bagley, Ph.D (Oct. 17, 2024)	
WX16	Supplemental Expert Report of Dr. Joseph Bagley, Ph.D (March 17, 2025)	
WX17	Expert Report of Dr. LaFleur Stephens-Dougan (Aug. 1, 2024)	
WX18	Errata to August 1, 2024 Expert Report of Dr. LaFleur Stephens-Dougan (Oct. 29, 2024)	
WX19	Expert Reply Report of Dr. LaFleur Stephens-Dougan (Oct. 17, 2024)	
WX20	Supplemental Expert Report of Dr. LaFleur Stephens-Dougan (March 17, 2025)	
	Expert Report Figures	
WX21	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 2: Dot Density Map of Black Population and 2022 and 2023 Congressional Plans	

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<sup>&</sup>lt;sup>2</sup> Expert reports include all exhibits and appendices attached to each respective report.

WX22	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 4: Dot Density Map of Race in the Piedmont Triad Region	
WX23	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 5: Piedmont Triad Major City Boundaries and 2023 District Boundaries	
WX24	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 6: Dot Density Map of Race in the Charlotte Area	
WX25	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 7: Charlotte City Boundary and 2023 Congressional District Boundaries	
WX26	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 8: Dot Density Map of Race, 2023 District 1 Boundaries, and 2022 District 1 Boundaries, Northeast North Carolina	
WX27	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 9: Dot Density Map of Race, 2023 District 1 Boundaries, and 2022 District 1 Boundaries, Oxford, NC Area	
WX28	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 12: Racial Dislocation Maps, 2022 Congressional Plans	
WX29	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 12: Racial Dislocation Maps, 2023 Congressional Plans	
WX30	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 1: Reproduction of Dr. Trende's Choropleth Map of the Piedmont Triad	
WX31	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 2: Reproduction of Dr. Trende's Choropleth Map of the Charlotte Area	
WX32	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 3: The Distribution of Black Voting-Age Population in Simulated Plans	
WX33	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 4: The Distribution of Black Voting-Age Population in Simulated Maps Versus 2023 Plan	
WX34	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 7: BVAP and BVAP Rank in Enacted and Simulated North Carolina Congressional Plans for Districts in the Piedmont Triad Area where Simulated Plans Produce Four Republican Seats	
WX35	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 9: BVAP Arrayed by Rank, Pro-Republican Simulated Plans and Draft Maps from September	
WX36	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 10: BVAP Arrayed by Rank, Pro-Republican Simulated Plans and Draft Springhetti Maps	

WX37	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 11: BVAP Arrayed by Rank, Pro-Republican Simulated Plans and Draft Maps from October	
WX38	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBP_1, Appendix 2	
WX39	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBP_5, Appendix 2	
WX40	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBK_2, Appendix 2	
WX41	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBA_2, Appendix 2	
WX42	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CDS 003 and CDS 005, Appendix 2	
WX43	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CMT_1 and CMT_2, Appendix 2	
WX44	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCH_4 and CMT_2, Appendix 2	
WX45	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCJ_1 and CCH_4, Appendix 2	
WX46	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCL_1 and CCJ_1, Appendix 2	
WX47	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCL_1 and Enacted, Appendix 2	
WX48	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 1: Histogram of Black Voting-Age Population (BVAP) in Alternative Plans and Enacted Plan (Excluding Districts 1, 11, and 12)	
WX49	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 2: The Enacted Plan in the Piedmont Triad	
WX50	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 3: Alternative Plan "CMT-1" in the Piedmont Triad	
WX51	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 4: Alternative Plan "Springhetti 3" in the Piedmont Triad	_
WX52	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 5: Alternative Plan "Springhetti 3, v2" in the Piedmont Triad	
WX53	Expert Report of Dr. Maxwell Palmer (Aug. 1, 2024), Figure 3: Racially Polarized Voting Estimates by Region	

WX54	Supplemental Expert Report of Maxwell Palmer, Ph.D. (March 17, 2025), Figure 2: Racially Polarized Voting Estimates by Region	
	Plaintiff Standing Declarations	
WX55	1/3/25 Declaration of Alan Rene Oliva Chapela	
WX56	1/3/25 Declaration of Allison Shari Allen	
WX57	1/3/25 Declaration of Flor Herrera-Picasso	
WX58	1/3/25 Declaration of German De Castro	
WX59	1/3/25 Declaration of James Adams	
WX60	1/3/25 Declaration of Laura McClettie	
WX61	1/3/25 Declaration of Luciano Gonzalez-Vega	
WX62	1/3/25 Declaration of Natalee Nanette Nieves	
WX63	1/3/25 Declaration of Nelda Leon	
WX64	1/3/25 Declaration of Shauna Williams	
WX65	1/3/25 Declaration of Virginia Keogh	
WX66	5/13/25 Declaration of Minerva Freeman	
WX67	5/13/25 Declaration of Maura Aceto	
WX68	5/13/25 Declaration of Javier Limon	
WX69	5/13/25 Declaration of Armenta Eaton	
WX70	5/13/25 Declaration of Chenita Johnson	
WX71	5/13/25 Declaration of Pamlyn Stubbs	
WX72	5/13/25 Declaration of Earl Jones	
	Legislative Redistricting – Hearing Transcripts	
WX73	10/19/23 House Redistricting Committee Transcript	LD0000001—
		LD00000053
WX74	10/19/23 Senate Redistricting and Elections Committee Transcript	LD0000683—
		LD0000783
WX75	10/23/23 Senate Redistricting and Elections Committee Transcript	LD0000784—
		LD0000827
WX76	10/24/23 Senate Chamber (Redistricting) Transcript	LD0001826—
		LD0001899
WX77	10/24/23 House Redistricting Committee Transcript	LD0000124—
		LD0000165
WX78	10/25/23 House Rules, Calendar, and Operations of the House	LD0003172—
	Transcript	LD0003200

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WX79	10/25/23 Senate Redistricting and Elections Committee Transcript	LD0000373—
		LD0000396
WX80	10/25/23 House Session (Redistricting) Transcript	LD0001723—
		LD0001825
	Legislative Redistricting – Public Comment Hearings and Portal Co	mments
WX81	H. Comm. on Redistricting, <i>Joint Committee Meeting Notice &amp; Bill Sponsor Notification: September 25, 2023</i> , N.C. House of Reps.,	Hise Ex. 12
	https://ncleg.gov/Committees/NoticeDocument/6424/Redistricting-(Joint)-400-PM.	
WX82	NCGA Email Alert of 9/25/23 Public Comment Session	LD0004748— LD0004749
WX83	H. Comm. on Redistricting, <i>Joint Committee Meeting Notice &amp; Bill Sponsor Notification: September 26, 2023</i> , N.C. House of Reps., <a href="https://www.ncleg.gov/Committees/NoticeDocument/6425/Redistrictin">https://www.ncleg.gov/Committees/NoticeDocument/6425/Redistrictin</a>	Hise Ex. 12
	g-(Joint)-400-PM.	
WX84	NCGA Email Alert of 9/26/23 Public Comment Session	LD0004745—
		LD0004746
WX85	H. Comm. on Redistricting, Joint Committee Meeting Notice & Bill Sponsor Notification: September 27, 2023, N.C. House of Reps,	Hise Ex. 12
	https://www.ncleg.gov/Committees/NoticeDocument/6426/Redistricting-(Joint)-400-PM.	
WX86	NCGA Email Alert of 9/27/23 Public Comment Session	LD0004756—
		LD0004747
WX87	9/25/23 Public Comment Session Transcript	LD0000397—
		LD0000435
WX88	9/26/23 Public Comment Session Transcript	LD0000436—
		LD0000538
WX89	9/27/23 Public Comment Session Transcript	LD0000539—
		LD0000682
WX90	9/28/23 Public Comment Report	LD0000939—
		LD0000946
WX91	10/5/23 Public Comment Report	LD0000828—
		LD0000848
WX92	10/12/23 Public Comment Report	LD0000849—
		LD0000874

	T	
WX93	10/19/23 Public Comment Report	LD0000875—
		LD0000882
WX94	10/23/23 Public Comment Report	LD0000883—
		LD0000895
WX95	10/24/23 Public Comment Report	LD0000896—
		LD0000907
WX96	10/25/23 Public Comment Report	LD0000908—
		LD0000938
	Legislative Redistricting – Additional Materials	
WX97	4/28/23 Speaker Moore Press Release	LD0001717—
		LD0001719
WX98	9/25/23 Redraw Process Letter to NCGA	LD0002197—
		LD0002201
WX99	9/28/23 Common Cause Emails Regarding 2023 Redistricting Process	LD0009230—
		LD0009231
WX100	9/29/23 Progress NC Action Email	LD0002538—
		LD0002540
WX101	10/3/23 Redistricting Criteria Letter (Cover Email)	LD0001489—
		LD0001491
WX102	10/3/23 Redistricting Criteria Letter	LD0001492—
		LD0001495
WX103	10/5/23 SCSJ Press Release	LD0002298—
		LD0002299
WX104	10/12/23 Notice to Preserve Records of Redistricting in Anticipation of	LD0004127—
	Litigation	LD0004128
WX105	10/18/23 Senate Notice of Committee Meeting and Bill Sponsor Notice Regarding 10/19/23 Hearing	LD0003777
WX106	10/22/23 SCSJ Correspondence Regarding Racially Polarized Voting	LD0002305—
		LD0002306
WX107	10/22/23 Racially Polarized Voting in North Carolina and its Effect on	LD0002339—
	the 2023 Redistricting Plans	LD0002343
WX108	10/22/23 Expert Memo of Dr. Kassra A.R. Oskooii	LD0002319—
		LD0002338
WX109	2023 Congressional Plan Criteria,	LD0004145; Barber
	https://webservices.ncleg.gov/ViewDocSiteFile/81643	Suppl. Ex. 7

WX110	Guidance for Drawing State House and Congressional Districts, <a href="https://webservices.ncleg.gov/ViewDocSiteFile/87692">https://webservices.ncleg.gov/ViewDocSiteFile/87692</a>	LD0004478; Springhetti Ex. 6
WX111	North Carolina Redistricting – 2011 Public Hearing Information, N.C. Gen. Assemb., <a href="https://www.ncleg.gov/Legislation/SupplementalDocs/2011/publichearings/redistricting">https://www.ncleg.gov/Legislation/SupplementalDocs/2011/publichearings/redistricting</a> .	
WX112	Legislative Calendar: September 2021, N.C. Gen Assemb., <a href="https://www.ncleg.gov/LegislativeCalendar/9/2021">https://www.ncleg.gov/LegislativeCalendar/9/2021</a> .	
WX113	2011 Redistricting Public Hearing Sites, https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/2011%20Public %20Hearing%20Site%20Map.pdf.	Hise Ex. 15
WX114	Joint Meeting of Committees, Criteria Adopted by the Committees (Aug. 12, 2021)	Hise Ex. 20
	Deposition Exhibits	
WX115	Joint Statement by Senator Bob Rucho, Chair of the Senate Redistricting Committee, and Representative David Lewis, Chair of the House Redistricting Committee, released on June 17, 2011	Hise Ex. 1
WX116	Email from Donna J. Somers to 2023 NC Senate Redistricting Committee Co-Chairs Daniel, Hise, Newton, and Committee Members	Hise Ex. 13, LD0001502-04
WX117	Expert Report of Dr. Jeffrey B. Lewis in North Carolina League of Conservation Voters v. Hall, No. 21-CVS-015426	Hise Ex. 23
WX118	Supplemental Expert Report of Dr. Jeffrey B. Lewis in <i>North Carolina League of Conservation Voters v. Hall</i> , No. 21-CVS-015426	Hise Ex. 24
WX119	Email from Steve Shapiro with subject "Prospective 2024 Congressional Districts – Particular Impact to Guilford County" on 9/19/2023	Hise Ex. 26, LD0001607
WX120	Email from Anne Brown to Sen. Ralph Hise with subject "Redistributing" on 10/25/2023	Hise Ex. 48, LD0002612
WX121	Email from Steve Shapiro with subject "Suggested Revisions to Congressional Map CCJ-1" on 10/21/2023	Hise Ex. 49, LD0002279
WX122	Facebook posts from Senator Ralph Hise	Hise Ex. 54
WX123	Dot density map comparing 2022 and 2024 Congressional boundaries in Mecklenburg	Hise Ex. 58
WX124	Dot density map comparing 2022 and 2024 Congressional boundaries in Piedmont Triad	Hise Ex. 57
WX125	Fred Backus, Anthony Salvanto, Big Majorities Reject Book Bans – CBS News Poll, CBS News (Feb. 22, 2022)	Taylor Ex. 4

WX126	Michael J. Pomante II, Cost of Voting in the American States: 2024, ELECTION LAW JOURNAL: RULES, POLITICS, AND POLICY	Taylor Ex. 6
WX127	Expert Report of Sean P. Trende in <i>Agee v. Benson</i> , No. 1:22-cv-00272 (W.D. Mich.) (Jan. 18, 2023)	Trende Ex. 3
WX128	Cheri Beasley's Senate Campaign Latest to Take on Race, Gender Barriers, Charlotte Post	Hood Ex. 3
WX129	Danielle Battaglia, NC TV Stations Pull Ad Attacking Senate Candidate Beasley Over Its "False Statements," News & Observer (Oct. 25, 2022)	Hood Ex. 4
WX130	Will Wright, <i>Group Targets Beasley with TV Ad About Sex Offender Case</i> , Charlotte Observer (Oct. 4, 2022)	Hood Ex. 5
WX131	Michael Barber and Kosuke Imai, Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records	Barber Ex. 4
WX132	Bernard Grofman, Lisa Handley, and David Lublin, Drawing Effective Miority Districts: A Conceptual Framework and Some Empirical Evidence, N.C. Law Review (June 1, 2001)	Alford Suppl. Ex. 4
WX133	Email from Rep. Destin Hall to Mr. Springhetti re "2023 North Carolina House and Congressional Redistricting" (Aug. 23, 2023)	LD0004475, Springhetti Ex. 4
	Discovery Responses	
WX134	Legislative Defendants' Objections and Responses to <i>Williams</i> Plaintiffs' First Set of Interrogatories (May 24, 2024)	
WX135	Legislative Defendants' Objections and Responses to <i>NAACP</i> Plaintiffs' First Set of Interrogatories (May 24, 2024)	
WX136	Responses to Plaintiffs' First Set of Interrogatories to State Board Defendants (June 19, 2024)	
WX137	Legislative Defendants' First Amended Privilege Log	Springhetti Ex. 3
WX138	Legislative Defendants' Third-Party Search Privilege Log	
	Maps	
WX139	2022 Interim Congressional Map, https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2022_Court/2 022%20Interim%20Congressional%20- %2011%20x%2017%20Map.pdf	Springhetti Ex. 16
WX140	2022 Interim Congressional Map StatPack Report, <a href="https://www.ncleg.gov/Files/GIS/Plans">https://www.ncleg.gov/Files/GIS/Plans</a> Main/Congress 2022 Court/2 <a href="https://www.ncleg.gov/Files/GIS/Plans">022%20Interim%20Congressional%20-%20StatPack2022</a> C.pdf	

WX141	Senate Bill 756: Congressional Districts 2023/CBP-5, <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/7468/0/Filed%20-%2011%20x%2017%20Map">https://webservices.ncleg.gov/ViewBillDocument/2023/7468/0/Filed%20-%2011%20x%2017%20Map</a>	
WX142	CBP-5 StatPack Report w Race, <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/7492/0/Filed%20-%20StatPack%20Report%20w%20Race">https://webservices.ncleg.gov/ViewBillDocument/2023/7492/0/Filed%20-%20StatPack%20Report%20w%20Race</a>	
WX143	Realign Congressional Districts 2023/CCJ-1, <a href="https://webservices.ncleg.gov/ViewDocSiteFile/81630">https://webservices.ncleg.gov/ViewDocSiteFile/81630</a>	
WX144	CCJ-1 StatPack Report, <a href="https://webservices.ncleg.gov/ViewDocSiteFile/81632">https://webservices.ncleg.gov/ViewDocSiteFile/81632</a>	
WX145	Senate Bill 757: Realign Congressional Districts 2023/CST-4, <a href="https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202">https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202</a>	
WX146	CST-4 StatPack Report w Race, https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202 023-145%20Congress%20-%20StatPack2023_RVR_C.pdf	
WX147	Draft maps, LD_MAP_000001-002610.pdf	LD_MAP_000001- 002610
WX148	CCH-1	LD_MAP_001613, Hise Ex. 33
WX149	CTE-1	LD_MAP_002609, Hise Ex. 35
WX150	CMT-2	LD_MAP_002334, Hise Ex. 38
WX151	CCJ-1	LD_MAP_001799, Hise Ex. 42
WX152	SST-11 Amend	Hise Ex. 52
WX153	SST-12 Amend	Hise Ex. 53
WX154	Draft map, CMT-1	
WX155	Draft map, CMT-2	
WX156	Draft map, CBA-2	
WX157	Draft map, CBK-2	
WX158	Draft map, CBP-1	
WX159	Draft map, CBP-5	
WX160	Draft map, CCH-4	
WX161	Draft map, CCJ-1	

WX162	Draft map, CCL-1	Springhetti Ex. 19
WX163	Draft map, CMT-1	
WX164	Draft map, CMT-2	
WX165	Draft map, CST-3	
WX166	Springhetti draft map, CDs 003	Springhetti Ex. 15
WX167	Springhetti draft map, CDs 003 v2	Springhetti Ex. 17
WX168	Springhetti draft map, CDs 005	Springhetti Ex. 18
	Other Bills	
WX169	Filed Version of H.B. 259 (N.C. Mar. 2, 2023), <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/1186/0/DRH10127-MHa-59">https://webservices.ncleg.gov/ViewBillDocument/2023/1186/0/DRH10127-MHa-59</a> .	
WX170	Conference Committee Substitute of H.B. 259, <a href="https://webservices.ncleg.gov/ViewBillDocument/2023/7268/0/H259-PCCS50044-MHXR-6">https://webservices.ncleg.gov/ViewBillDocument/2023/7268/0/H259-PCCS50044-MHXR-6</a> .	
WX171	Bill History of House Bill 259 / SL 2023-134, <a href="https://www.ncleg.gov/BillLookup/2023/H259">https://www.ncleg.gov/BillLookup/2023/H259</a>	
WX172	Enacted H.B. 259 (N.C. Oct. 3, 2023), https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H259v7.pdf	
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WX173	North Carolina's Population: Short-term Challenges, Long-term Growth Factors, <i>North Carolina Office of State Budget and Management</i> (May 2021), <a href="https://www.osbm.nc.gov/2021-population-dynamics-report/open">https://www.osbm.nc.gov/2021-population-dynamics-report/open</a> .	
WX174	Melissa Boughton, <i>Hofeller Files: Lawmakers Lied to Federal Court in 2017, Preventing NC from Getting Special Election</i> , NC Newsline (June 6, 2019), <a href="https://ncnewsline.com/2019/06/06/hofeller-files-lawmakers-lied-to-federal-court-in-2017-preventing-nc-from-getting-special-election/">https://ncnewsline.com/2019/06/06/hofeller-files-lawmakers-lied-to-federal-court-in-2017-preventing-nc-from-getting-special-election/</a> .	
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WX177	Video: Jesse Helms "Hands" Ad, <a href="https://www.youtube.com/watch?v=KIyewCdXMzk">https://www.youtube.com/watch?v=KIyewCdXMzk</a> ; also available at <a href="https://www.pbs.org/30secondcandidate/timeline/years/1990_j.html">https://www.pbs.org/30secondcandidate/timeline/years/1990_j.html</a> .	
WX178	Annette Fuller, <i>Flier Opens an Old Wound</i> , WINSTON-SALEM JOURNAL (Oct. 21, 2010), <a href="https://journalnow.com/news/local/flier-opens-an-old-wound/article_77fcaa90-d964-5230-8146-0eb6588ae397.html">https://journalnow.com/news/local/flier-opens-an-old-wound/article_77fcaa90-d964-5230-8146-0eb6588ae397.html</a> .	
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WX181	Video: Ted Budd For Senate, "Crush the Broken Biden Beasley Agenda," <a href="https://www.youtube.com/watch?v=K4IbK9wTgjk">https://www.youtube.com/watch?v=K4IbK9wTgjk</a> .	
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